



Alain M. Baudry
Phone: (612) 225-2947
Fax: (612) 677-3844
alain.baudry@saul.com
www.saul.com

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VIA ECF and VIA EMAIL

Tostrud_chambers@mnd.uscourts.gov

The Honorable Eric C. Tostrud
U.S. District Judge, District of Minnesota
United States District Court
316 N. Robert Street
St. Paul, MN 55101

Re: *Orbit Sports, LLC v. Glen Taylor, et al.*
Case No: 0:21-cv-01289-ECT-TNL

Dear Judge Tostrud:

Following our call with the Court this morning I can report as follows: 1) the NBA advises that it may well be in a position to issue its decision on approval of the sale of the 1st 20% Limited Partnership Interest by June 30, so that remains a realistic possibility; and 2) the Buyer reminded us that the Purchase Agreement provides time is of the essence and does not desire to delay the closing of the first transaction for any reason.

Under the circumstances, Defendants remain prepared to file their opposition brief to the motion for preliminary injunction by June 21 and to have the hearing any time that is convenient for the Court starting June 22, 2021. I would be remiss if I did not point out that Plaintiff's filed its complaint on May 26, and has long been aware of the June 30 closing date. It apparently only decided to file for a preliminary injunction after I advised its counsel last week that we had secured an August 16 hearing date for our motion to dismiss and that we anticipated a closing of the transaction before that date.

The point is that if the Plaintiff truly felt there was an emergency, one would not have expected it to wait three weeks to bring a motion to enjoin a June 30 closing. That said, we remain committed to having this matter heard at the earliest possible hearing date prior to June 30, and will endeavor to work cooperatively with opposing counsel and the Court to allow this to happen.

Very truly yours,

s/ *Alain Baudry*

Alain M. Baudry

cc: All counsel of record (via email)